

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

DANNY BURTON,

*Plaintiff,*

Case No. 2:20-cv-11948

v.

Hon. Paul D. Borman

RONALD SANDERS,

*Defendant.*

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***THIRD* STIPULATED ORDER FOR EXTENDING  
ALL SCHEDULED DATES**

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The parties having stipulated to the entry of an Order extending scheduled dates by a period of four month and the Court being fully advised in the premises;

Upon stipulation of the parties, by and through their respective counsel, good cause is shown as follows

1. On October 20, 2022, the Court entered an order extending all scheduled dates. (RE 69).
2. Since the entry of parties prior stipulated order, the parties have continued conducting significant written discovery and depositions.
3. However, this case spans more than 30 years and requires discovery into dozens of witnesses, many of whom the parties are having trouble locating.
4. In addition to conducting ordinary but extensive discovery, the parties

have been involved in significant motion practice regarding discovery.

5. Additionally, the parties have agreed to have court-ordered mediation conducted by Hon. Dan Ryan (ret.), with whom the parties have had previous success. Unfortunately, the first available mediation date is not until August 1, 2023.

6. In order to allow for meaningful mediation, the parties have stipulated and agreed to adjourning all dates as follows:

- a. Discovery cutoff completed by November 1, 2023;
- b. Facilitation to be conducted on August 1, 2023;
- c. Expert Disclosures/Reports (Proponent) by November 15, 2023;
- d. Expert Disclosures/Reports (Rebuttal) by January 5, 2024;
- e. Non-Expert Motions in Limine by January 5, 2024;
- f. Motions Challenging Experts by February 9, 2024;
- g. Dispositive Motions filed by February 9, 2024;
- h. Pretrial Submissions, Final Pretrial Conference and Jury Trial to be set by the Court.

7. The parties enter into this stipulation in good faith and not for any improper or dilatory purpose, but to allow them to adequately prepare their claims and defenses, to avoid any unnecessary time and expense thoroughly evaluating the possibility of motions for summary judgment and to engage in additional meaningful settlement negotiations.

8. This Third Amended Case Management Order incorporates the Court's

case management requirements and any provisions from prior case management orders that have not been modified by this order.

IT IS SO ORDERED.

s/Paul D. Borman

HON. Paul D. Borman

United States District Court Judge

Dated: March 15, 2023

STIPULATED AND AGREED:

/s/Ayanna Hatchett

JOHNSON LAW, PLC

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Ayanna Hatchett (P70055)

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